



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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**BY ECF**

Hon. Arun Subramanian, United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Jane Doe 1 v. Gov't of the U.S. Virgin Islands, et al.*, Case No. 1:23-cv-10301-AS  
(S.D.N.Y.) – Clarification of Plaintiffs' Misstatement

Dear Judge Subramanian:

Plaintiffs' amended response to the Court's January 24, 2025 Order asserts: "All of the prior Epstein litigation has taken place in this district for a reason, including the USVI's pursuit of numerous claims . . ." (Dkt. 197 at 3). Contrary to Plaintiffs' representation, the Government filed a civil enforcement action against Epstein's estate in the Superior Court for the U.S. Virgin Islands, where Epstein's estate was in probate. Only the Government's case against forum-defendant JPMorgan was litigated in New York. Counsel for Plaintiffs declined to correct his submission.

While Plaintiffs' assertion has nothing to do with the question posed by the Court regarding transfer, the Government believed it appropriate to correct the record.

Respectfully submitted,

David I. Ackerman

cc: Counsel of record (via ECF)